

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al., <i>Plaintiffs,</i> v. GREGORY W. ABBOTT, et al., <i>Defendants.</i>	5:21-cv-844-XR
OCA-GREATER HOUSTON, et al., <i>Plaintiffs,</i> v. JOSE A. ESPARZA, et al., <i>Defendants.</i>	1:21-cv-0780-XR
HOUSTON JUSTICE, et al., <i>Plaintiffs,</i> v. GREGORY WAYNE ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0848-XR
LULAC TEXAS, et al., <i>Plaintiffs,</i> v. JOSE EXPARZA, et al., <i>Defendants.</i>	1:21-cv-0786-XR
MI FAMILIA VOTA, et al., <i>Plaintiffs,</i> v. GREG ABBOTT, et al., <i>Defendants.</i>	5 :21-cv-0920-XR

PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiffs in the above-captioned actions, collectively, serve these Requests for Production upon Defendant Kenneth Paxton, in his official capacity as the Texas Attorney General.

Responses to these Requests are to be produced to Graham White within 30 days of receipt. To arrange for electronic production, please contact Mr. White at gwhite@elias.law. Anything that cannot be produced electronically should be produced to Mr. White at Elias Law Group LLP, 10 G Street NE, Suite 600, Washington, D.C. 20002.

Each Request for Production is subject to the Definitions and Instructions listed below.

DEFINITIONS

Except as specifically defined below, the terms used in this request shall be construed and defined in accordance with the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Western District of Texas, wherever applicable. Any terms not defined shall be given their ordinary meaning.

1. “2020 Ballot Fraud Intervention Team” means the Ballot Fraud Intervention Team established by the Texas Attorney General’s Office in 2020.

2. “2021 Election Integrity Unit” refers to the 2021 Texas Election Integrity Unit established by the Texas Attorney General’s Office in 2021.

3. “24-hour voting” means any method of voting at polling places between the hours of 7:00 p.m. and 7:00 a.m.

4. “Any” or “all” mean “any and all.”

5. “Communication” is synonymous in meaning and scope to the term “communication” as used in Local Rule 26, and includes any transfer of information of any type, whether written, oral, electronic, or otherwise, and includes transfers of information via email,

report, letter, text message, voicemail message, written memorandum, note, summary, and other means.

6. “Curbside voting” means, as defined in Tex. Elec. Code § 64.009, any method of voting where a voter, who is physically unable to enter the polling place without personal assistance or likelihood of injuring the voter's health, request that an election officer deliver a ballot to the voter at the polling place entrance or curb.

7. “Date” means the exact day, month, and year, if ascertainable, or, if not, the best available approximation (including relationship to other events).

8. “Demographics” means characteristics relating to the population or groups within the population and, as used herein, expressly includes but is not limited to race, age, and gender.

9. “Document” is synonymous in meaning and scope to the term “document” as used in Federal Rule of Civil Procedure 34 and Local Rule 26 and includes, but is not limited to, records, reports, lists, data, statistics, summaries, analyses, communications (as defined above), computer discs, tapes, printouts, emails, databases, and any handwritten, typewritten, printed, electronically recorded, taped, graphic, machine-readable, or other material, of whatever nature and in whatever form, including all non-identical copies and drafts thereof, and all copies bearing any notation or mark not found on the original.

10. “Drive-thru voting” means any method of voting in which a voter casts a ballot from inside a motor vehicle.

11. “Drop box voting” means any method of voting in which a voter casts a ballot by depositing their ballot in a ballot box located outside of a polling place.

12. “Early voting” means any method of voting that occurs prior to the uniform election date for a primary or general election.

13. “Including” means including, but not limited to.

14. “Person” means not only natural persons, but also firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, trust groups, and organizations; federal, state, and local governments or government agencies, offices, bureaus, departments, or entities; other legal, business, or government entities; and all subsidiaries, affiliates, divisions, departments, branches, and other units thereof or any combination thereof.

15. “SB 1” means the legislation designated as Senate Bill 1, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state; increasing criminal penalties; creating criminal offenses,” that was enacted during the 87th Second Called Session of the Texas Legislature and signed by the Governor of Texas on September 7, 2021, including any predecessor or related bills from any legislative session in 2021.

16. “SB 7” means the legislation designated as Senate Bill 7, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state; increasing criminal penalties; creating criminal offenses,” that was introduced during the 87th Regular Session of the Texas Legislature, including any predecessor or related bills from any legislative session in 2021.

17. “HB 3” means the legislation designated as House Bill 3, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state; increasing criminal penalties; creating criminal offenses,” that was introduced during the 87th First Called Session of the Texas Legislature, including any predecessor or related bills from any legislative session in 2021.

18. “HB 6” means the legislation designated as House Bill 6, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state;

increasing criminal penalties; creating criminal offenses,” that was introduced during the 87th Regular Session of the Texas Legislature, including any predecessor or related bills from any legislative session in 2021.

19. “Straight-ticket voting” means any method of voting in which a voter may select a political party’s candidates in one motion or gesture.

20. “Texas Legislature” means the members and staff of the Texas Senate and Texas House of Representatives.

21. “Voter” means any registered voter in Texas and all persons who may properly register to vote in Texas by the close of discovery in this case.

22. “Vote-by-mail” means any method of voting in which a voter casts a ballot received in the mail.

23. “Vote harvesting” means, as defined in SB 1, an in-person interaction with one or more voters, in the presence of the ballot or during the voting process, intended to deliver votes for a specific candidate or measure.

24. “You” and “your” means Texas Attorney General Kenneth Paxton, and his office, including its employees, staff, agents, and representatives.

INSTRUCTIONS

1. You shall produce materials and serve responses and any objections within 30 days after service of these Requests for Production.

2. If you object to any part of a request, set forth the basis of your objection and respond to all parts of the request to which you do not object. Any ground not stated in a timely objection is waived.

3. If, in responding to these Requests for Production, you encounter any ambiguities when construing a request or definition, set forth the matter deemed ambiguous and the construction used in responding.

4. Regarding any document withheld from production on a claim of privilege or work product protection, provide a written privilege log identifying each document individually and containing all information required by Federal Rule of Civil Procedure 26(b)(5), including a description of the basis of the claimed privilege and all information necessary for Plaintiff to assess the claim of privilege.

5. Produce all documents available to you or subject to your access or control that are responsive to the following document production topics. This includes documents in your actual or constructive possession or control and in the actual or constructive possession or control of your attorneys, investigators, experts, and anyone else acting on your behalf.

6. Documents are to be produced as they are kept in the ordinary course of business. Accordingly, documents should be produced in their entirety, without abbreviation, redaction, or expurgation; file folders with tabs or labels identifying documents responsive to this subpoena should be produced intact with the documents; and documents attached to each other should not be separated.

7. All documents are to be produced in electronic form. All documents including emails, should be produced in single page TIFF format, showing comments and track changes where applicable, with text extract and load files containing standard fielded information and metadata. TIFF images shall be placed in an Images folder with any given subfolder not to exceed 5,000 images per folder and accompanied by an .opt placed in a Data folder. Each page of a document should be assigned a unique production number (aka Bates number) electronically

“burned” onto the image at allocation that does not unreasonably conceal or interfere with information on the document. The number should be consistent across the production, contain no special characters, and be numerically sequential within a given document. Attachments to documents should be assigned numbers that directly follow in sequential order the Bates numbers on the documents to which they were attached. If a number or set of numbers is skipped, the skipped number or set of numbers should be noted, for example with a placeholder.

8. Each request and subparagraph thereof are to be answered separately. To the extent that you do not have any documents reflecting the information requested herein, and/or any means of recording the information requested herein, please so indicate in your response to the specific production request.

9. Each document produced should be categorized by the number of the document request in response to which it is produced.

10. If any otherwise responsive document was, but is no longer, in existence or in your possession, custody, or control, identify the type of information contained in the document, its current or last known custodian, the location/address of such document, and the identity of all persons having knowledge or who had knowledge of the document, and also describe in full the circumstances surrounding its disposition from your possession or control.

11. These Requests are continuing in nature, up to and including the course of trial. Materials sought by these Requests that become available after you serve your responses must be disclosed to counsel for Plaintiff by supplementary response or responses.

12. Pursuant to Federal Rule of Civil Procedure 26(e), you are under a duty to promptly amend your responses to these Requests if you learn that an answer is in some material respect incomplete or incorrect. If you expect to obtain further information or expect the accuracy of a

response given to change between the time responses are served and the time of trial, you are requested to state this fact in each response.

13. If you contend that it would be unreasonably burdensome to obtain and provide all of the documents called for in response to any document request or any subsection thereof, then in response to the appropriate document request: (a) produce all such documents as are available to you without undertaking what you contend to be an unreasonable request; (b) describe with particularity the efforts made by you or on your behalf to produce such documents; and (c) state with particularity the grounds upon which you contend that additional efforts to produce such documents would be unreasonable.

14. The singular form of a noun or pronoun includes the plural form, and the plural form includes the singular.

15. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of a document production topic all responses that otherwise might be construed to be outside its scope.

16. A reference to an entity in this request shall be construed to include its officers, directors, partners, members, managers, employees, representatives, agents, consultants, and anyone acting on its behalf.

17. The document production topics apply to the period from 2016 through the present, unless otherwise limited or expanded by a particular topic description.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1. All documents and communications regarding any rationale(s) for drafting or enacting SB 1, SB 7, HB 3, or HB 6.

REQUEST FOR PRODUCTION NO. 2. All documents and communications regarding the implementation or enforcement of SB 1, SB 7, HB 3, or HB 6.

REQUEST FOR PRODUCTION NO. 3. All documents and communications regarding voter turnout, including patterns of voter turnout by racial or ethnic minorities, disabled persons, and partisan affiliation during the 2020 primary and general elections.

REQUEST FOR PRODUCTION NO. 4. All documents and communications regarding the impact or potential impact of SB 1, SB 7, HB 3, or HB 6 on particular demographics, including but not limited to racial or ethnic minorities, disabled persons, and party affiliation.

REQUEST FOR PRODUCTION NO. 5. All documents and communications regarding usage of the following methods of voting by racial or ethnic minorities and disabled persons, or by party affiliation, during the period from 2016 to present:

- (a) Drop-box voting;
- (b) Drive-thru voting;
- (c) 24-hour voting;
- (d) Straight-ticket voting;
- (e) Vote-by-mail;
- (f) Early voting;
- (g) Curbside voting;
- (h) All other methods of voting.

REQUEST FOR PRODUCTION NO. 6. All documents and communications regarding voter assistance, including transportation assistance and voting harvesting, and patterns of requests for voter assistance by race, ethnicity, disability status, or party affiliation during the period from 2016 to present.

REQUEST FOR PRODUCTION NO. 7. All documents and communications regarding the number or proportion of Texas residents, Texas citizens of voting age, or Texas registered

voters who have, or lack, a driver's license, election identification certificate, personal identification card, or social security number, including patterns by race, ethnicity, disability status, or party affiliation from 2016 to present.

REQUEST FOR PRODUCTION NO. 8. All documents and communications discussing actual or alleged illegal voting, election fraud, or other criminal conduct in connection with the following methods of voting during the period from 2016 to present:

- (a) Drop-box voting;
- (b) Drive-thru voting;
- (c) 24-hour voting;
- (d) Straight-ticket voting;
- (e) Vote-by-mail;
- (f) Early voting;
- (g) Curbside voting;
- (h) All other methods of voting.

REQUEST FOR PRODUCTION NO. 9. All documents and communications regarding the methods you took to secure, monitor, surveil, watch, or supervise the following methods of voting during the period from 2016 to present:

- (a) Drop-box voting;
- (b) Drive-thru voting;
- (c) 24-hour voting;
- (d) Straight-ticket voting;
- (e) Vote-by-mail;
- (f) Early voting;

(g) Curbside voting;

(h) All other methods of voting.

REQUEST FOR PRODUCTION NO. 10. All documents and communications regarding actual or alleged illegal voting, election fraud, or other criminal conduct in connection with voter assistance, including transportation assistance and vote harvesting, during the period from 2016 to present.

REQUEST FOR PRODUCTION NO. 11. All documents and communications regarding instances of actual or alleged violence, discrimination, harassment, intimidation, or inappropriate behavior from a partisan poll watcher, poll worker, or election judge, during the period from 2016 to present.

REQUEST FOR PRODUCTION NO. 12. All documents and communications regarding the purpose of forming the 2020 Ballot Fraud Intervention Team and the 2021 Texas Election Integrity Unit of the Office of the Texas Attorney General.

REQUEST FOR PRODUCTION NO. 13. All documents and communications related to voting practices, election administration, and voter turnout in Harris County.

REQUEST FOR PRODUCTION NO. 14. All documents and communications related to actual or alleged election fraud, illegal voting, and other criminal conduct relating to elections in Harris County.

REQUEST FOR PRODUCTION NO. 15. All documents and communications related to voting practices, election administration, and voter turnout in Bee County.

REQUEST FOR PRODUCTION NO. 16. All documents and communications related to actual or alleged election fraud, illegal voting, and other criminal conduct related to elections in Bee County.

REQUEST FOR PRODUCTION NO. 17. All documents and communications related to voting practices, election administration, and voter turnout in Bexar County.

REQUEST FOR PRODUCTION NO. 18. All documents and communications related to actual or alleged election fraud, illegal voting, and other criminal conduct relating to elections in Bexar County.

REQUEST FOR PRODUCTION NO. 19. All communications between you and the Texas Legislature regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1, SB 7, HB 3, and HB 6 on racial or ethnic minorities, disabled persons, and on voters by party affiliation.

REQUEST FOR PRODUCTION NO. 20. All communications between you and the Texas Governor regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1 on racial or ethnic minorities, disabled voters, and voters by party affiliation.

REQUEST FOR PRODUCTION NO. 21. All communications between you and the Texas Lieutenant Governor regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1, SB 7, HB 3, and HB 6 on racial or ethnic minorities and disabled voters, and on voters by party affiliation.

REQUEST FOR PRODUCTION NO. 22. All communications between you and the Texas Secretary of State regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1, SB 7, HB 3, and HB 6 on racial or ethnic minorities and disabled voters, and on voters by party affiliation.

REQUEST FOR PRODUCTION NO. 23. All documents and communications between you and local election officials regarding SB 1, SB 7, HB 3, and HB 6, including

communications regarding the impacts or potential impacts of SB 1, SB 7, HB 3, and HB 6 on racial or ethnic minorities and disabled voters, and on voters by party affiliation.

REQUEST FOR PRODUCTION NO. 24. All communications between you and the following third-party organizations, including any of their affiliates or subsidiaries, regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1 on racial or ethnic minorities and disabled voters, and on voters by party affiliation:

- (a) The Heritage Foundation
- (b) The Texas Public Policy Foundation
- (c) The American Legislative Exchange Council
- (d) The State Policy Network
- (e) Honest Elections Project
- (f) Public Interest Legal Foundation
- (g) American Civil Rights Union
- (h) Project Veritas
- (i) The Republican National Committee

Dated: November 29, 2021.

Respectfully submitted,

/s/ Sean Morales-Doyle

Sean Morales-Doyle (NY Bar No. 5646641)
Eliza Sweren-Becker* (NY Bar No. 5424403)
Patrick A. Berry* (NY Bar No. 5723135)
Andrew B. Garber* (NY Bar No. 5684147)
Jasleen K. Singh* (Cal. Bar No. 316596)
**BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW**
120 Broadway, Suite 1750
New York, NY 10271
Telephone: (646) 292-8310
Facsimile: (212) 463-7308

/s/ Uzoma N. Nkwonta

Uzoma N. Nkwonta*
Kathryn E. Yukevich*
Graham W. White*
ELIAS LAW GROUP LLP
10 G Street NE, Suite 600
Washington, D.C. 20002
Telephone: (202) 968-4490
unkwonta@elias.law
kyukevich@elias.law
gwhite@elias.law

sean.morales-doyle@nyu.edu
eliza.sweren-becker@nyu.edu
patrick.berry@nyu.edu
andrew.garber@nyu.edu
jasleen.singh@nyu.edu

Paul R. Genender (Tex. Bar No. 00790758)
Elizabeth Y. Ryan (Tex. Bar No. 24067758)
Matthew Berde* (Tex. Bar No. 24094379)
Megan Cloud** (Tex. Bar No. 24116207)
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-8158
Facsimile: (214) 746-7777
Paul.Genender@weil.com
Liz.Ryan@weil.com
Matt.Berde@weil.com
Megan.Cloud@weil.com

Alexander P. Cohen* (Tex. Bar No.
24109739)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8020
Facsimile: (212) 310-8007
Alexander.Cohen@weil.com

*Attorneys for Plaintiffs Friendship-West
Baptist Church; Anti-Defamation League
Austin, Southwest, And Texoma Regions;
Texas Impact; James Lewin*

REED SMITH LLP, NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC., THE ARC OF THE
UNITED STATES, INC.

/s/ Kenneth E. Broughton
Texas Bar No. 03087250
kbroughton@reedsmith.com

Lora Spencer
Texas Bar No. 24085597
lspencer@reedsmith.com

*Counsel for Plaintiffs LULAC Texas, Voto
Latino, Texas Alliance for Retired Americans,
and Texas AFT*

*Admitted *Pro Hac Vice*

/s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046)
Julia R. Longoria (Tex. Bar No. 24070166)
**MEXICAN AMERICAN LEGAL DEFENSE AND
EDUCATIONAL FUND**
110 Broadway, Suite 300
San Antonio, TX 78205
Telephone: (210) 224-5476
Facsimile: (210) 224-5382
nperales@maldef.org
jlongoria@maldef.org

Michael C. Keats*
Rebecca L. Martin*
Breanna Williams***
Jonathan Bash***
**FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP**
One New York Plaza
New York, New York 10004
Telephone: (212) 859-8000
Facsimile: (212) 859-4000
michael.keats@friedfrank.com
rebecca.martin@friedfrank.com
breanna.williams@friedfrank.com
jonathan.bash@friedfrank.com

Christopher Bell*
**FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP**
801 17th Street, NW
Washington, DC 20006
Telephone: (202) 639-7000
Facsimile: (202) 639-7003
christopher.bell@friedfrank.com

Attorneys for Plaintiffs La Unión Del Pueblo Entero;

J. Keely Dulaney*
Texas Bar No. 24116306
kdulaney@reedsmith.com

Reed Smith LLP
811 Main Street, Suite 1700
Houston, TX 77002-6110
Telephone: (713) 469-3800
Facsimile: (713) 469-3899

Sarah M. Cummings
Texas Bar No. 24094609
Reed Smith LLP
2850 N. Harwood Street, Suite 1500
Dallas, TX 75201
Telephone: (469) 680-4200
Facsimile: (469) 680-4299
scummings@reedsmith.com

Kathryn Sadasivan*
Amir Badat*
NAACP Legal Defense and Educational
Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006
Telephone: (212) 965-2200
Facsimile: (212) 226-7592
ksadasivan@naacpldf.org
abadat@naacpldf.org

Jennifer A. Holmes*
Georgina Yeomans*
NAACP Legal Defense and Educational
Fund, Inc.
700 14th Street NW, Suite 600
Washington, DC 20005
Telephone: (202) 682-1300
Facsimile: (202) 682-1312
jholmes@naacpldf.org
gyeomans@naacpldf.org

Shira Wakschlag*
The Arc of the United States, Inc.
1825 K Street NW, Suite 1200
Washington, DC 20006
Telephone: (202) 534-3708

*Southwest Voter Registration Education Project; Mexican
American Bar Association of Texas;
Texas Hispanics Organized for Political Education;
Jolt Action; William C. Velasquez Institute; Fiel Houston Inc.*

/s/ Marc T. Rasich
Sean Lyons
State Bar No. 00792280
Sean@lyonsandlyons.com
Clem Lyons
State Bar No. 12742000
Clem@lyonsandlyons.com

Wendy J. Olson (Pro hac vice)
Laura E. Rosenbaum (Pro hac vice)
Marc Rasich (Pro hac vice)
Elijah Watkins (Pro hac vice)
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205

Courtney Hostetler (Pro hac vice)
Ron Fein (Pro hac vice)
John Bonifaz (Pro hac vice)
Ben Clements (Pro hac vice)
FREE SPEECH FOR PEOPLE
1320 Centre Street, Suite 405
Newton, MA 02459
chostetler@freespeechforpeople.org
rfein@freespeechforpeople.org
jbonifaz@freespeechforpeople.org
bcllements@freespeechforpeople.org

*Attorneys for Plaintiffs Mi Familia Vota, Marla
Lopez, Marlon Lopez, Paul Rutledge*

Mimi M.D. Marziani
Texas Bar No. 24091906
Ryan V. Cox
Texas Bar No. 24074087
Hani Mirza
Texas Bar No. 24083512
TEXAS CIVIL RIGHTS PROJECT
1405 Montopolis Drive
Austin, TX 78741

Facsimile: (202) 534-3731

Wakschlag@thearc.org

* Admitted Pro Hac Vice

*Counsel for Plaintiffs Houston Justice;
Houston Area Urban League; Delta Sigma
Theta Sorority, Inc.; The Arc of Texas; and
Jeffrey Lamar Clemmons*

512-474-5073 (Telephone)

512-474-0726 (Facsimile)

mimi@texascivilrightsproject.org

ryan@texascivilrightsproject.org

hani@texascivilrightsproject.org

Thomas Buser-Clancy

Texas Bar No. 24078344

Savannah Kumar

Texas Bar No. 24120098

Andre Segura

Texas Bar No. 24107112

ACLU FOUNDATION OF TEXAS, INC.

5225 Katy Freeway, Suite 350

Houston, TX 77007

Telephone: (713) 942-8146

Fax: (915) 642-6752

tbuser-clancy@aclutx.org

skumar@aclutx.org

asegura@aclutx.org

Adriel I. Cepeda Derieux*

Ari Savitzky*

Sophia Lin Lakin*

Samantha Osaki*

**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**

125 Broad St., 18th Floor

New York, NY 10004

(212) 284-7334

acepedaderieux@aclu.org

asavizky@aclu.org

slakin@aclu.org

sosaki@aclu.org

Susan Mizner*

**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION**

39 Drumm St.

San Francisco, CA 94111

(415) 343-0781 (phone)

smizner@aclu.org

Lia Sifuentes Davis

Texas State Bar No. 24071411

Lucia Romano

Texas State Bar No. 24033013
DISABILITY RIGHTS TEXAS
2222 West Braker Lane
Austin, Texas 78758-1024
(512) 454-4816 (phone)
(512) 454-3999 (fax)
ldavis@drtx.org
lromano@drtx.org

Jerry Vattamala*
Susana Lorenzo-Giguere*
**ASIAN AMERICAN LEGAL DEFENSE
AND EDUCATION FUND**
99 Hudson Street, 12th Floor
New York, NY 10013
(212) 966-5932 (phone)
(212) 966 4303 (fax)
jvattamala@aaldef.org
slorenzo-giguere@aaldef.org

Jessica Ring Amunson*
Urja Mittal*
JENNER & BLOCK LLP
1099 New York Ave. NW, Suite 900
Washington, DC 20001
(202) 639-6000
jamunson@jenner.com
umittal@jenner.com

COUNSEL FOR THE OCA-HG PLAINTIFF GROUP

*admitted *pro hac vice*